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7 *Attorneys for Defendants*
8 *David Mar and Romeo Aranas*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 DON SAVAGE,
12 Plaintiff,
13 v.
14 ARANAS, et al.,
15 Defendants

Case No. 3:17-cv-00612-MMD-CBC

**MOTION FOR EXTENSION OF TIME
TO FILE DISPOSITIVE MOTIONS**

(First Request)

16 Defendants, Dr. David Mar and Dr. Romeo Aranas, by and through counsel, Aaron
17 D. Ford, Attorney General of the State of Nevada, and Ian E. Carr, Deputy Attorney
18 General, hereby submit their Motion for Extension of Time to File Dispositive Motions
19 (First Request). This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the
20 following Memorandum of Points and Authorities, and all papers and pleadings on file in
21 this action.

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 **I. ARGUMENT**

24 Defendants respectfully request a sixty (60) day extension of time out from the
25 current deadline (August 2, 2019) to file dispositive motions in this case. Defense counsel
26 is in the process of winding down or transferring most assigned cases, and his last official
27 day representing the Nevada Department of Corrections (NDOC) in full capacity is July /

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1 31, 2019. Defense counsel requests this extension to ensure that his successor will have
2 enough time to familiarize himself or herself with the case.

3 Furthermore, defense counsel submits that this Division has experienced a wave of
4 recent retirements and departures. Although the Division is depleted, new Deputy
5 Attorneys General (DAGs) should be arriving in early August to help restore normal
6 functionality. Defense counsel respectfully requests this extension to accommodate the
7 new arrivals and the Division during this transition period.

8 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
9 follows:

10 When an act may or must be done within a specified time, the
11 court may, for good cause, extend the time: (A) with or without
12 motion or notice if the court acts, or if a request is made, before
the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

13 Defendants' request is timely and will not hinder or prejudice Plaintiff's case, but will
14 allow for a thorough briefing to narrow or eliminate issues in this case. The requested
15 sixty (60) day extension of time should permit the parties time to adequately research
16 draft, and submit dispositive motions in this case. Defendants assert that the requisite
17 good cause is present to warrant the requested extension of time.

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1 For these reasons, Defendants respectfully request a sixty (60) day extension of
2 time from the current deadline to file dispositive motions in this case, with a new
3 deadline to and including Friday, October 2, 2019.

4 DATED this 26th day of July, 2019.

5 AARON D. FORD
6 Attorney General

7 By:


8 IAN E. CARR, Bar No. 13840
9 Deputy Attorney General

10 *Attorneys for Defendants*

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12 IT IS SO ORDERED.

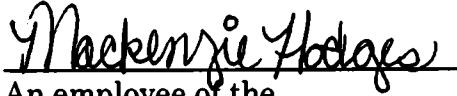
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14 U.S. MAGISTRATE JUDGE

15 DATED: 7/29/2019
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 26th day of July, 2019, I caused to be served a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS (First Request)**, by U.S. District Court CM/CEF Electronic Filing on:

Don Savage, #1004487
Ely State Prison
P.O. Box 1989
Ely, NV 89301


An employee of the
Office of the Attorney General